

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

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In re:	:	
	:	PROMESA
THE FINANCIAL OVERSIGHT AND	:	Title III
MANAGEMENT BOARD FOR PUERTO	:	
RICO,	:	
	:	
as representative of,	:	
	:	No. 17 BK 3283-LTS
THE COMMONWEALTH OF PUERTO	:	
RICO, <i>et al.</i>	:	(Jointly Administered)
	:	
Debtors. ¹	:	

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**URGENT UNOPPOSED MOTION SEEKING EXTENSION OF DEADLINE TO
FILE VERIFIED STATEMENT OF DELOITTE CONSULTING LLP AND
DELOITTE FINANCIAL ADVISORY SERVICES LLP DISCLOSING
CONNECTIONS TO MATERIAL INTERESTED PARTIES PURSUANT TO
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURE ACT**

To the Honorable United States District Court Judge Laura Taylor Swain:

Deloitte Consulting LLP (“Deloitte Consulting”) and Deloitte Financial Advisory Services
LLP (together with Deloitte Consulting, the “Deloitte US Entities”) respectfully submit this motion
(the “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit A**,

¹ The Debtors in the jointly-administered Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

extending the deadline for the Deloitte US Entities to file their verified statement(s) pursuant to the *Order Approving List of Material Interested Parties Pursuant to The Puerto Rico Recovery Accuracy In Disclosures Act* [ECF No. 20467] (“Order”) and the *Puerto Rico Recovery Accuracy in Disclosures Act*, Pub. L. No. 117-82 (“PRRADA”). In support of this Motion, the Deloitte US Entities respectfully represent as follows:

Relief Requested

1. By this Motion, the Deloitte US Entities request an order extending the deadline to file its final verified statement, pursuant to PRRADA, until June 15, 2022.
2. On February 22, 2022, the Oversight Board filed the *Motion of Financial Oversight and Management Board for Puerto Rico Requesting Order Approving Proposed List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosures Act* [ECF No. 20194] (the “PRRADA Motion”), seeking Court approval of a list of material interested parties attached thereto as **Exhibit A** (the “Initial MIP List”) pursuant to PRRADA.
3. On March 21, 2022, the Court entered its *Order Regarding Proposed List of Material Interested Parties Pursuant to the Puerto Rico Recovery Accuracy in Disclosure Act* [ECF No. 20419], directing the Oversight Board to file an amended MIP List.
4. On March 29, 2020, the Oversight Board filed the *Notice of Filing Amended List of Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosures Act* [ECF No. 20458], which attached a list of material interested parties with respect to all Title III Debtors as Exhibit A thereto (the “Amended MIP List”). The Amended MIP List broke out the material interested parties in separate schedules for each of the debtors.

5. On March 30, 2022, the Court entered the Order, which approved the Amended MIP List and directed all professionals to file the disclosures required under PRRADA by May 16, 2022.

6. The Deloitte US Entities are in the process of reviewing their connections to the parties on the Amended MIP List and preparing their verified statement(s) pursuant to PRRADA. In order to finalize and file their verified statement(s), the Deloitte US Entities expect to need thirty (30) additional days, until June 15, 2022. Accordingly, the Deloitte US Entities request an extension of thirty (30) days to submit their verified statement(s), without prejudice to their ability to seek further extensions of such deadline.

7. The Deloitte US Entities obtained the consent of the United States Trustee for this extension of time.

8. No prior request for the relief sought in this Motion has been made to this or any other court.

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WHEREFORE the Deloitte US Entities respectfully request the Court to enter the Proposed Order attached hereto as **Exhibit A**, granting the relief requested herein and all other relief that is just and proper.

Dated: May 13, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Alexandra Casellas-Cabrera
Alexandra Casellas-Cabrera
USDC-PR No. 301010

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Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

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In re:	:	
	:	PROMESA
THE FINANCIAL OVERSIGHT AND	:	Title III
MANAGEMENT BOARD FOR PUERTO	:	
RICO,	:	
	:	
as representative of,	:	
	:	
THE COMMONWEALTH OF PUERTO	:	No. 17 BK 3283-LTS
RICO, <i>et al.</i>	:	
	:	(Jointly Administered)
	:	
Debtors. ²	:	

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**ORDER EXTENDING DEADLINE TO
FILE VERIFIED STATEMENT PURSUANT TO
PUERTO RICO RECOVERY ACCURACY IN DISCLOSURE ACT**

Upon the *Urgent Unopposed Motion Seeking Extension of Deadline to File Verified Statement of Deloitte Consulting LLP and Deloitte Financial Advisory Services LLP Disclosing Connections to Material Interested Parties Pursuant to Puerto Rico Recovery Accuracy in Disclosure Act* (the “Motion”);³ and the Court having found it has subject matter jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue is proper pursuant

² The Debtors in the jointly-administered Title III Cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

³ Capitalized terms used but not otherwise defined herein have the meanings given to them in the Motion.

to PROMESA section 307(a); and the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest, it is **HEREBY ORDERED THAT:**

1. The Motion is granted as set forth herein.
2. The deadline for Deloitte Consulting LLP and Deloitte Financial Advisory Services LLP to file their verified statement(s) pursuant to the *Order Approving List of Material Interested Parties Pursuant to The Puerto Rico Recovery Accuracy in Disclosures Act* [ECF No. 20467] and the Puerto Rico Recovery Accuracy in Disclosures Act, Pub. L. No. 117-82, shall be extended to **June 15, 2022**, without prejudice to the right of Deloitte Consulting LLP and Deloitte Financial Advisory Services LLP to request further extensions of such deadline.

3. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

4. This Order resolves docket entry no. _____.

SO ORDERED.

Dated: _____, 2022
San Juan, Puerto Rico

LAURA TAYLOR SWAIN
United States District Judge